

CORNELL GRACE, P.C.

ATTORNEYS AT LAW

TRINITY CENTRE

AMY SCHAEFER
212.233.1112 direct
212.233.1110 fax

111 BROADWAY-SUITE 810
NEW YORK, NEW YORK 10006
P: 212.233.1100
F: 212.233.1110

EMAIL:
aschaefer@cornellgrace.com

May 22, 2019

Supreme Court of the State of New York
County of Bronx Edward A. Frey, Esq.
Differentiated Case Management Department
851 Grand Concourse Room 217
Bronx, New York 10451

**Re: Javier v. Hyde Leadership Charter School, , Peter Anderson, Jane Doe
Teacher and New York Department of Education
Index #: 25643/2015(E)**

Dear DCM Department:

Our office represents the Defendants Hyde Leadership Charter School, Peter Anderson and Jane Doe Teacher in the above-captioned matter that is assigned to Justice Lizbeth Gonzalez, J.S.C.

We respectfully request a conference to address matters of outstanding discovery; namely,

1. An outstanding response to Defendant's discovery demand dated May 1, 2018 Plaintiff has failed to properly respond to our Post Deposition discovery demands, dated May 1, 2018. Specifically, the Plaintiff has failed to provide a compliant authorization for the release of Marisol Javier's employment records, although good faith correspondence was sent to the Plaintiff's counsel on December 11, 2018; and

2. The Note of Issue has not been filed. The filing deadline was April 30, 2018 pursuant to the Compliance Conference Order dated September 12, 2017.

Thank you for your consideration of this request.

Respectfully submitted,
CORNELL GRACE, P.C.



By: Amy L. Schaefer